



Federal Major Source PAL

A story of an actual emission cap

Federal PAL

■ What is a PAL?

- An alternate approach for determining major NSR applicability
- an annual facility-wide emission limitation for one or more pollutants
- Allows a facility to make changes under the cap without triggering major NSR review
- PAL lasts for 10 years

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■ Establishing a PAL

- based on actual emissions for all existing emission units over any 24-month period in the last 10 years (must have data)
- use PTE for any emissions unit that was added after the 24-month period selected for the baseline reduce baseline emissions if a new requirement has taken effect since the 24-month baseline period

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- **Establishing a PAL (con'd)**
- add the PSD significant emissions rate for the PAL pollutant(s)
- subtract any emissions from units included in the 24-month baseline that have shutdown

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- Reopening the PAL
 - Shall be reopened by DNR for:
 - typographical errors or errors in calculating the PAL emission limit
 - to reduce the PAL to generate emissions reduction credits for offset purposes
 - to revise the PAL to reflect an increase in the PAL

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- Reopening the PAL (con'd)
 - DNR may reopen the PAL to:
 - reduce the PAL to reflect newly applicable Federal requirements
 - reduce the PAL consistent with any other requirement that the State may impose under its SIP
 - reduce the PAL if the DNR determines that a reduction is necessary to avoid causing or contributing to a NAAQS or PSD increment violation (i.e. avoid the exceedance of an ambient air quality standard)

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■ Increasing a PAL

- Allowed only if the increased emissions can not be accommodated under the PAL even if all significant and major emission units were to meet a BACT level of control
- emissions units causing the need for the increase (modified or new units) must go through major NSR review

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■ Increasing a PAL

- new PAL based on:
 - baseline actual of small emissions units
 - baseline actual of significant and major emission units assuming a BACT level of control
 - allowable emissions of new or modified units

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■ PAL Renewal

- If baseline actual emissions plus significant level are greater than or equal to 80% of current PAL, then PAL may be renewed at current level
- if less than 80% of current PAL then PAL may be lowered to a level which is more representative of baseline actual emissions or a level more appropriate based on air quality needs or other considerations



■ PAL Renewal

- the new renewed PAL level cannot be higher than the existing PAL without going through the PAL increase provisions

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■ PAL Expiration

- Within 6-18 months of PAL expiration, the source must submit a proposed allocation of the PAL among existing emissions units
- The DNR makes the decision on how the PAL will be distributed and incorporates these limits into an operating permit
- normal NSR requirements apply thereafter